

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-
GUERRA, MICHAEL MAERLENDER, BRANDON
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY
TATIANA WEAVER, and CAMERON WILLIAMS,
individually and on behalf of all others similarly situated,

Case No. 1:22-cv-00125

Plaintiffs,

v.

Hon. Matthew F. Kennelly

BROWN UNIVERSITY, CALIFORNIA INSTITUTE
OF TECHNOLOGY, UNIVERSITY OF CHICAGO,
THE TRUSTEES OF COLUMBIA UNIVERSITY IN
THE CITY OF NEW YORK, CORNELL
UNIVERSITY, TRUSTEES OF DARTMOUTH
COLLEGE, DUKE UNIVERSITY, EMORY
UNIVERSITY, GEORGETOWN UNIVERSITY, THE
JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS
INSTITUTE OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME DU
LAC, THE TRUSTEES OF THE UNIVERSITY OF
PENNSYLVANIA, WILLIAM MARSH RICE
UNIVERSITY, VANDERBILT UNIVERSITY, and
YALE UNIVERSITY,

Defendants.

**PLAINTIFFS' MOTION FOR CLARIFICATION FOR
RESPONDING TO MR. BACH-Y-RITA'S DECLARATION**

Considering the potential scope of the hearing scheduled for August 8, 2025, Plaintiffs have prepared (1) a two-page bench memorandum on the applicable *in camera* review standard for any materials Mr. Bach-y-Rita intends to rely upon at the hearing, and (2) a four-page joint declaration from Mr. Normand, Mr. Gilbert, and Mr. Cramer addressing Mr. Bach-y-Rita's contentions to date, including some background regarding his lack of a foundation for his allegations. Plaintiffs respectfully seek clarification as to whether the Court would prefer for

Plaintiffs to (a) file these materials under seal in advance of the hearing (naturally our preference, if the Court permits), (b) provide them to the Court at the outset of the hearing, or (c) submit the materials only if the Court determines to consider them at the hearing.

Dated: August 5, 2025

/s/ Robert D. Gilbert

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/s/ Eric L. Cramer

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Respectfully Submitted,

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